SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

DRAFT STAFF REPORT FOR PROPOSED AMENDED RULE 1113 – ARCHITECTURAL COATINGS

Dated: June 1, 2007

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SOUTH COAST AIR QUALITY MANAGEMENT DISTRICT

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EXECUTIVE SUMMARY

Rule 1113 – Architectural Coatings was first adopted in 1977 and has been amended numerous times. It is applicable to manufacturers, distributors, and end-users of architectural coatings. In November 1996, the South Coast Air Quality Management District (AQMD) Governing Board (Board) amended Rule 1113 - Architectural Coatings to include an averaging compliance provision as a flexibility option providing a more cost-effective and flexible approach for manufacturers to transition compliant product lines into the marketplace. To use the Averaging Compliance Option successfully, a manufacturer must be able to distribute sufficient volumes of products with VOC content below applicable limits in order to offset the excess emissions from products with VOC content above the limits. One limitation of using the ACO, requires a manufacturer to have a broad array of commercial products, with sufficient volume of sales of products that are below the applicable VOC limit.

One manufacturer, affected by the limitation of the ACO described above, has recently requested that the Stationary Source Committee, a subcommittee of the Board, direct staff to prepare amendments to Rule 1113 by removing the specialty primer category from the ACO provision because they were at a competitive disadvantage. The Stationary Source Committee, as a result of these discussions, directed staff to propose an amendment to Rule 1113 – Architectural Coatings to remove specialty primers from the ACO provision. After staff commenced rule making and subsequent to the Stationary Source committee's direction to staff, the manufacturer withdrew its request. The Stationary Source Committee then advised staff the requested rule amendment would not be necessary.

However, during implementation of recent amendments to the rule, it became apparent that by adding mica to the definition of metallic pigmented coatings it is improperly less restrictive than the federal definition and a correction to delete mica from the definition is therefore necessary. Staff also became aware that the test method in the rule used to determine the metal content of metallic pigmented coatings was outdated. In addition, during the public outreach it was pointed out that a sentence in the Appendix to the Rule is obsolete and therefore it is proposed to be deleted.

STAFF PROPOSAL

Staff has withdrawn the proposal to amend the ACO provision but is continuing to propose the following amendments to clarify issues related to rule implementation:

- Amend the definition of metallic pigmented coatings to make it consistent with the federal AIM rule by removing the words "mica particles or any combination of metallic pigments and mica particles."

- Update the Test Method used to determine the weight percent of elemental metal in metallic coatings, to reflect current practice.

- Delete the following obsolete sentence from Appendix A, Section A of the rule: "Manufacturers that submitted an annual exemption report in 2002 for quick-dry primers, sealers and undercoaters and included those coatings in their most recent approved ACO Program, may continue to average those coatings until July 1, 2006, so long as these coatings do not exceed 450 grams of VOC per liter of coating less water

and less exempt compounds, in lieu of the otherwise applicable VOC limit of 350 grams per liter."

STAFF ASSESSMENT FOR THE PROPOSED AMENDMENTS

Metallic Pigmented Coatings

Staff developed the metallic pigmented coating category with a VOC limit of 500 g/l for decorative coatings containing at least 0.4 pounds per gallon (48 grams/liter) of metal such as gold and silver. The category does not include coatings in other categories with much lower VOC limits such as industrial maintenance coatings, zinc primers, and roof coatings that might contain metals as well. In 2003, at the request of some manufacturers, staff added mica to the definition of metallic pigmented coatings to allow a wider range of metallic color choices. During the implementation phase of this definition, it became apparent, however, that the addition of mica made the definition of metallic pigmented coatings less restrictive than the federal definition for a metallic pigmented coating, which does not include mica under the "National Volatile Organic Compound Emission Standards for Architectural Coatings." A local air district rule cannot be less stringent than a federal regulation, but may be more restrictive; therefore, the staff proposal will eliminate reference to mica making the definition consistent with the federal definition, but continue to exclude all industrial coatings and roof coatings from the metallic pigmented coating definition, which is more restrictive than the federal definition. On January 9, 2007, staff mailed a letter to architectural coating manufacturers and their association, clarifying that mica would not be considered as part of the metallic content standard of 0.4 pounds per gallon included in the definition. A copy of the letter is included as Attachment A.

Test Method

Staff is recommending the test method referred to in Rule 1113 - Architectural Coatings paragraph (e)(3), AQMD Method 311 Determination of Percent Metal in Metallic Coatings by Spectrographic Method, be updated to AQMD Method 318 Determination of Weight Percent Elemental Metal in Coatings by X-Ray Diffraction to reflect the method used in current practice. Although AQMD Method 311 is a valid method, it is based on outdated technology and requires equipment that the AQMD does not have and can no longer obtain. The AQMD laboratory has developed Method 318, an improved method for the determination of the elemental metal content in coatings. Method 318 has been accepted by the U.S. EPA and adopted by other regulatory agencies throughout California and the rest of the Nation. The AQMD laboratory specifically developed Method 318 to address the analysis of elemental aluminum because that was the metal of interest in the majority of the coatings at the time of the test method development. The test method states that it is currently only validated for the determination of the weight percent of elemental aluminum but also states that it is applicable for the determination of other elemental metals or crystalline materials for which appropriate standards are available and reasonable performance has been demonstrated. Validation of Method 318 for other elemental metals could be completed as necessary.

EMISSIONS IMPACT, COST AND COST-EFFECTIVENESS

Since mica is not a VOC, mica's removal from the definition of metallic pigmented coatings will not impact emissions. The other proposed change to update the test method will likewise not impact emissions but make the rule more enforceable.

The updated test method is currently in use nation-wide as the standard and therefore, no additional costs are expected from its use.

Since this is not an Air Quality Management Plan (AQMP) control measure and there is no change in emissions or costs from the proposed amendments, there is no requirement to conduct a Socioeconomic Impact Assessment.

CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA)

The proposed amendments to Rule 1113 - Architectural Coatings will be reviewed pursuant to CEQA and an appropriate CEQA document will be prepared and will be considered for certification concurrently with the consideration for adoption of PAR 1113.

SOCIOECONOMIC ASSESSMENT

The proposed amendments to Rule 1113 do not significantly affect air quality or emissions limitations and therefore, a socioeconomic impact analysis pursuant to Health and Safety Code Section 40440.8 is not required.

LEGISLATIVE AUTHORITY

The California Legislature created the AQMD in 1977 (The Lewis Presley Air Quality Management Act, Health and Safety Code Section 40400 et seq.) as the agency responsible for developing and enforcing air pollution controls and regulations in the Basin. By statute, the AQMD is required to adopt an AQMP demonstrating compliance with all state and federal ambient air quality standards for the Basin [California Health and Safety Code Section 40440(a)]. Furthermore, the AQMD must adopt rules and regulations that carry out the AQMP [California Health and Safety Code Section 40440(a)]

AQMP AND LEGAL MANDATES

The California Health and Safety Code requires the AQMD to adopt an AQMP to meet state and federal ambient air quality standards in the South Coast Air Basin. In addition, California Health and Safety Code requires the AQMD to adopt rules and regulations that carry out the objectives of the AQMP. Although the proposed amendments do not result in emission reductions, the amendments are consistent with AQMP objectives. This proposal does not impose a new emission limit or standard, make an existing emission limit or standard more stringent or impose new or more stringent monitoring, reporting or recordkeeping requirements and therefore, is not subject to the comparative analysis provisions of Health and Safety Code Section 40727.2.

DRAFT FINDINGS UNDER CALIFORNIA HEALTH AND SAFETY CODE

Health and Safety Code Section 40727 requires that prior to adopting, amending or repealing a rule or regulation, the AQMD Governing Board shall make findings of necessity, authority, clarity, consistency, non-duplication, and reference based on relevant information presented at the hearing. The draft findings are as follows:

Necessity - The AQMD Governing Board has determined that a need exists to amend Rule 1113 - Architectural Coatings to amend the definition of metallic pigmented coatings, update

the test method for metallic pigmented coatings and delete outdated text in Appendix A, Section A of the rule.

Authority - The AQMD Governing Board obtains its authority to adopt, amend, or repeal rules and regulations from Health and Safety Code Sections 39002, 40000, 40001, 40440, 40702, and 41508.

Clarity - The AQMD Governing Board has determined that the proposed amendments to Rule 1113 - Architectural Coatings, are written and displayed so that the meaning can be easily understood by persons directly affected by them.

Consistency - The AQMD Governing Board has determined that PAR 1113 - Architectural Coatings, is in harmony with, and not in conflict with or contradictory to, existing statutes, court decisions, federal or state regulations.

Non-Duplication - The AQMD Governing Board has determined that the proposed amendments to Rule 1113 - Architectural Coatings do not impose the same requirement as any existing state or federal regulation, and the proposed amendments are necessary and proper to execute the powers and duties granted to, and imposed upon, the AQMD.

Reference - In adopting these amendments, the AQMD Governing Board references the following statutes which the AQMD hereby implements, interprets or makes specific: Health and Safety Code Sections 40001 (rules to achieve ambient air quality standards), 40440(a) (rules to carry out the Air Quality Management Plan), and 40440(c) (cost-effectiveness), 40725 through 40728 and Federal Clean Air Act Sections 171 et sq., 181 et seq., and 116.

CONCLUSION AND RECOMMENDATION

Staff recommends amendments to the definition of metallic pigmented coatings to be consistent with the federal definition, updating the test method to determine the weight of elemental metals in metallic pigmented coatings and deleting outdated language in Appendix A, Section A of Rule 1113.

REFERENCES

40 CFR Part 59, Subpart D – National Volatile Organic Compound Emission Standards for Architectural Coatings, September 11, 1998.

COMMENTS AND RESPONSES

During the rule making process, both oral and written questions, comments, and suggestions were received and reviewed by staff and are summarized in this section. After the review, staff revised the proposed amendments to reflect many of the comments and suggestions. If comments regarding the same topic were received from different individuals, staff summarized the topic into one comment and response.

U.S EPA sent a rule review comment letter on the Proposed Amended Rule 1113, work shopped on April 19, 2007, and strongly support the removal of mica from the Rule 1113 definition of metallic pigmented coatings so the definition will be as stringent as the metallic pigmented coating definition in the National AIM Rule in 40 CFR Part 59 Subpart D.

Comment: Dry-fog coatings should be added to those categories allowed to be averaged in the Averaging Compliance Option of Rule 1113. The solvent-based dry-fog coatings do not require as much preparation prior to painting as the water-based dry-fog coatings, which do not adhere to dirty substrates found in areas such as industrial buildings.

Response: *Dry-fog (dry-fall) coatings are defined as coatings applied by spray application only so that the overspray droplets dry before falling on floors and other surfaces. After staff contacted and met with manufacturers of dry-fog coatings during amendments to Rule 1113 in 2006, the main issues discussed were potential slower dry times associated with low-VOC coatings especially during high humidity conditions and adherence of the coating to dirty surfaces. It was generally agreed that low-VOC dry-fog coatings might require more substrate preparation than a solventborne coating. However, waterborne acrylic dry-fog coatings are an environmentally acceptable alternative to traditional solvent-based ceiling coatings. They emit a very low odor during application, and have a low flash point. Waterborne acrylic dry-fog coatings are especially well suited for spaces with pre-cast concrete or steel beam ceilings. They can save time and make application easier in an occupied space. Staff's technology assessment confirmed excellent market penetration and currently available dry-fog coatings at 150 g/l or less. The amendments resulted in lowering the VOC limit for dry-fog coatings from 400 g/l to 150 g/l effective July 1, 2007. At that time architectural coating manufacturers did not request that dry-fog coatings be added to the list of categories allowed to be averaged in the Averaging Compliance Option (ACO).*

California Air Resources Board (CARB) is proposing changes to the Architectural Coatings Suggested Control Measure for adoption in 2007. AQMD staff will be reviewing the adopted amendments along with the most recent California architectural coating sales and emission data provided by CARB, to further assess emission reductions for Rule 1113. At that time staff will also evaluate allowing additional coating categories to be averaged in the ACO.

Comment: CARB held a workshop on architectural coatings and they stated in that meeting that their Board does not want staff to encourage the exemption of carcinogens and they were referring to a question on Tertiary-Butyl Acetate (TBAc) that one of the industry people asked if it were going to be exempted in the industrial maintenance coatings. So CARB through their Board has decided not to consider exemptions for TBAc. I would like to request that the AQMD revisit the exemption of TBAc for industrial maintenance coatings.

Response: *The commentator made the same request during the 2006 amendments to Rule 1113 during which TBAc was exempted from the definition of volatile organic compounds (VOC) for use in industrial maintenance coatings (IM) only. A full review of comments both supporting the use of TBAc in architectural coatings and objections to its use along with staffs responses to comments may be read in the CEQA analysis and the comments and response section of the Staff Report for the June 2, 2006 Rule 1113 amendments.*

Briefly, staff made the decision to exempt TBAc for IM coatings based on its risk assessment for use in IM Coatings, where applicators typically use Personal Protective Equipment (PPE) including respirators, and the distance to sensitive receptors is

sufficient to mitigate the acute risks. The health risk analysis was prepared for AQMD staff using standard health risk protocol, health risk values provided by California's Office of Environmental Health Hazard Assessment (OEHHA) staff and parameters used by CARB to estimate risk from TBAc. In the case of TBAc, there is little available information on the toxicity of TBAc, but there is some toxicity information available on one of its metabolites, tert-butyl alcohol (TBA). While there are studies that indicate tumors in rats and mice when exposed to high concentrations of TBA, TBA has not yet been classified as a human carcinogen. In analyzing TBAc's impacts staff also considered CARB documents that assert TBAc's ozone reduction benefits. Staff's very conservative analysis from the use of TBAc based products only, indicates that the potential chronic cancer risk and acute risk is below the AQMDs significant risk threshold. Staff does not recommend expanding the exemption for TBAc to other categories because alternative compliant products that do not pose the added potential risk exist. By limiting the exemption for TBAc to IM coatings, the AQMD recognizes and limits the potential cancer risk exposure due to the use of TBAc while providing the coating manufacturers with flexibility in formulating products compliant with the future IM coatings limits in PAR 1113. Staff will continue to evaluate additional information relative to TBAc's toxicity including toxicity studies conducted by the manufacturer of TBAc, as it becomes available and reevaluate its position as necessary.

Comment: AQMD should consider a broader exemption of TBAc for other categories of architectural coatings during this amendment.

Response: *See the above response.*

Comment: The AQMD should reconsider the methodology by which you are trying to achieve your ends. To preclude the broad concept of industrial maintenance coatings from ever being a metallic pigmented coatings doesn't make sense to me. Aluminum metallic pigmented coatings are both decorative and functional as a protective coating. The proposed definition would only allow the coating to be marketed as a decorative coating without functionality. The definition could say the coatings must have metallic appearance, they should look metallic, gold, silver, or bronze-like which would give the decorative appearance staff is looking for. Functionality should not be eliminated from the definition.

Response: *Staff's primary issue with the definition of metallic pigmented coatings is to remove reference to mica particles in order to make the definition as stringent as the federal and state definition for this category. In response to several comments regarding the proposed changes to the definition of metallic pigmented coatings, staff will remove the word "decorative" recognizing that metallic pigmented coatings have both functionality and decorative characteristics. In addition, staff will also remove reference to the exclusion of "all industrial maintenance coatings" with a reminder that the most restrictive clause in the rule requires a coating to have the lower VOC limit if the coating is labeled or advertised to fall into two or more coating categories.*

Comment: Staff might want to consider whether the following sentence located in Appendix A, Section (A) is necessary: "Manufacturers that submitted an annual exemption report in 2002 for quick-dry primers, sealers and undercoaters and included those coatings in their most recent approved ACO Program, may continue to average those coatings until July 1, 2006, so

long as these coatings do not exceed 450 grams of VOC per liter of coating less water and less exempt compounds, in lieu of the otherwise applicable VOC limit of 350 grams per liter."

Response: *Thank you for pointing out the obsolete language which staff is proposing to delete from Appendix A, Section A of Rule 1113.*

Comment: Several commentators strongly suggested that staff should not remove primers, sealers, undercoaters; quick-dry primers, sealers, undercoaters; and specialty primers from the Averaging Compliance Option. Allowing these categories to be in the averaging provision provides more flexibility to the manufacturers and does not affect emission reductions for the AQMD one way or the other. Some commentators expressed a need for the lower VOC primers in the averaging provision to offset emissions from high-VOC products in other categories.

Response: *The amendments to the ACO provision has been withdrawn from the staff proposal. The Stationary Source Committee Board members directed staff to propose an amendment to remove specialty primers from the Averaging Compliance Option at the request of an architectural coating manufacturer (as explained in this Staff Report) when it was determined the requesting manufacturer could not take advantage of the ACO as its competitors have been able to do. It is noted that since staff received that direction from the Stationary Source Committee, the manufacturer has withdrawn its request for the amendment.*

Comment: The proponent of the initial request to remove specialty primers from the Averaging Compliance Option has notified staff it wishes to withdraw that request. Subsequent to the last Stationary Source Committee meeting some unintended consequences were made apparent and therefore; the proponent has since submitted a letter to the AQMD requesting withdrawal of the initial request. All Board members of the Stationary Source Committee, the Chairman of the Governing Board and the Executive Officer have been made aware of the withdrawal request and discussion of this matter will be included on the next Stationary Source Committee Meeting agenda.

Response: *See the above comment and response.*

Comment: The averaging program provides a needed mechanism for the continued supply of effective architectural and industrial maintenance coatings in the face of ever more stringent reductions in the VOC content of the coatings mandated by Rule 1113. We oppose many of the VOC limits of the rule because we believe that they do not allow technologically feasible coatings to be manufactured with all of their necessary performance characteristics. We do not believe that the averaging program can fully compensate for these deficiencies in Rule 1113. Moreover, not all companies can avail themselves of the benefits of the program because they do not have a sufficiently large product mix to allow them to do so.

Response: *During litigation on the VOC limits specified in The Table of Standards for Rule 1113, the courts have validated staff's technology assessments showing that low-VOC coating performance characteristics meet or exceed those of their higher-VOC counterpart. The current proposal does not change any VOC limits and staff does not recommend relaxing any VOC limits. Staff relies on a number of key sources of data and information for determining the availability and performance of coatings. These include:*

- *CARB Surveys which provide sales, emission data, market penetration and VOC content of coatings actually sold in California.*
- *Web-based searches where staff has found compliant and super-compliant low-VOC coatings verified by examining Technical Data Sheets and Material Safety Data Sheets.*
- *Field Visits to New Construction Sites where staff visited more than 100 new construction sites in 2004 and 2005 in order to determine what products the contractors are using and whether they are working. Overall, most of the construction sites visited had applied architectural coatings that are much lower than the current specified limits in many different categories and had used many super-compliant products that meet the future limits in Rule 1113. Even with the super-compliant products, all of the contractors indicated that they were satisfied with their performance.*
- *Performance studies by various public service agencies which have completed testing of low-VOC industrial maintenance coatings (some with the exempt solvent TBAc) in recent years and have found compliant products with acceptable performance.*
- *Meetings with local manufacturers (large and small) to inquire about their successes and failures in preparing for the low-VOC limits. These manufacturers indicated that compliant products are available and that they exhibit acceptable performance for their markets.*
- *A point of distribution survey of local store inventories. The primary purpose of the surveys was to obtain a snapshot of the currently available architectural products being sold from store shelves. This limited survey indicated that products meeting the 2006 VOC limits were available and being sold to consumers.*
- *A review of select technical papers and articles on advancements in the coatings industry. Manufacturers of coatings rely heavily on the research and development efforts of the raw materials suppliers. Successful reformulation by individual coating companies requires different resins and additives. The 2005 Annual Status Report on architectural coatings provides excerpts from these articles that overwhelmingly indicate that there are ongoing technological achievements to support compliant product formulation. Papers presented at the recent Western Coatings Society Symposium and Show indicate the availability and support from resin and additive suppliers of low-VOC components that meet and exceed the future VOC limits in Rule 1113 and expected performance characteristics as compared to traditional higher VOC containing materials.*
- *AQMD contracted performance studies with industry experts to conduct laboratory studies to assess the performance characteristics of low-VOC products. A review of these studies supports staff conclusions that overall super-compliant coatings meet or exceed expected characteristic performance standards when compared to products that have much higher VOC content.*
- *Studies of alternate means of compliance provided by the rule by examining the number of manufacturers who have taken advantage of the Averaging Compliance Option and sell-through provisions as well as the small container exemption.*

ATTACHMENT A

Letter to coating manufacturers, distributors and associations regarding metallic pigmented coatings

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

Dear Coating Manufacturer/Distributor: January 9, 2007

Re: METALLIC PIGMENTED COATING

The South Coast Air Quality Management District (AQMD) is the local air pollution control agency responsible for the non-desert portion of Los Angeles county, the lower desert portion of San Bernardino county, the western section of Riverside county (as far east as the Salton Sea area) and all of Orange county. This outreach letter is intended to expand upon the definition of a metallic pigmented coating.

As a manufacturer or distributor of architectural coating products, you should be aware that AQMD Rule 1113 (www.aqmd.gov/rules/reg/reg11/r1113.pdf), Architectural Coatings, is applicable to any person who supplies, sells, offers for sale, or manufactures any architectural coating for use in the AQMD jurisdiction that is intended to be field applied to stationary structures or their appurtenances, and to mobile homes, pavements or curbs; as well as any person who applies or solicits the application of any architectural coating. The purpose of this rule is to limit the VOC content of architectural coatings used in the AQMD jurisdiction and as such, there are specific limits that apply as shown in the Table of Standards of the attached rule.

There has been some confusion in the coatings industry on the definition of a metallic pigmented coating. Rule 1113 defines a metallic pigmented coating as "coatings, excluding roof coatings, containing at least 0.4 pounds per gallon (48 grams/liter) of coating, as applied, of elemental metallic pigment (excluding zinc), mica particles or any combination of metallic pigments and mica particles." However, the definition for a metallic pigmented coating under the National AIM Rule does not include mica. Since a local air district rule cannot be less stringent than a federal regulation, in the case of metallic pigmented coatings, mica may not be used to meet the definition of a metallic pigmented coating, since that is not allowed under the definition in the National AIM Rule. On another related note, a local air district may be more restrictive than a Federal or State regulation, and as such, the AQMD will continue to exclude zinc from the metallic pigmented coating definition. The bottom line is that no manufacturer or distributor shall be allowed to make or distribute a metallic pigmented coating for use within the AQMD having an allowable maximum VOC limit of 500 g/L, unless it meets the federal definition excluding zinc. This means that mica shall not be considered as part of the metallic content when attempting to meet the 0.4 pounds per gallon as stating in the Rule 1113 definition for metallic pigmented coatings.

This letter serves as notification that any coating manufactured after January 31, 2007 must contain at least 0.4 pounds of elemental metal per gallon of coating in order to meet the definition of a metallic pigmented coating; if not, it will be deemed non-compliant and subject to the issuance of a Notice of Violation.

If you have any questions please contact David De Boer, Senior Staff Specialist, at (909) 396-2329.

Sincerely,

Laki T. Tisopulos, Ph.D., P.E.
Assistant Deputy Executive Officer

Attachments: FACTSHEET

South Coast
Air Quality Management District
21865 Copley Drive, Diamond Bar, CA 91765-4178
(909) 396-2000 • www.aqmd.gov

Metallic Pigmented Coating Fact Sheet:

South Coast Air Quality Management District (SCAQMD)
Rule 1113 Architectural Coatings Section (b) (32):

METALLIC PIGMENTED COATINGS are coatings, excluding roof coatings, containing at least 0.4 pounds per gallon (48 grams/liter) of coating, as applied, of elemental metallic pigment (excluding zinc), mica particles or any combination of metallic pigments and mica particles.

California Air Resources Board (ARB)
Suggested Control Measure (SCM) for Architectural Coatings Section 2.31:

Metallic Pigmented Coating: A coating containing at least 48 grams of elemental metallic pigment per liter of coating as applied (0.4 pounds per gallon), when tested in accordance with SCAQMD Method 318-95, incorporated by reference in subsection 6.5.4.

Environmental Protection Agency (EPA)
National Volatile Organic Compound Emission Standards for Architectural Coatings
40 CFR Part 59 Subpart D:

Metallic pigmented coating means a nonbituminous coating containing at least 0.048 kilogram of metallic pigment per liter of coating (0.4 pound per gallon) including, but not limited to, zinc pigment.

Since a local air district may not be less restrictive than the Federal regulation, the SCAQMD will enforce Metallic Pigmented Coatings as:

METALLIC PIGMENTED COATINGS are coatings, excluding roof coatings, containing at least 0.4 pounds per gallon (48 grams/liter) of coating, as applied, of elemental metallic pigment (excluding zinc).